

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Amite BioEnergy, LLC – Wood Pellet Manufacturing Facility
1763 Georgia Pacific Road No. 2
Gloster, Amite County, Mississippi

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) (i.e., the “Federal Act”) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: [DATE]

Effective Date: As Specified Herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Expires: [Date Not to Exceed 5 Years from Issuance]

Permit No.: 0800-00050

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit non-compliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the following provisions:

(a) This permit shall be reopened and revised under any of the following circumstances:

- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of three (3) or more years. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
- (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
- (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (b) Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Re-openings shall not be initiated before a notice of such intent is provided to the Title V source by the Department of Environmental Quality (DEQ) at least thirty (30) days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

- 1.6 The permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

- 1.7 The provisions of this permit are severable. If any provision of this permit (or the application of any provision of this permit to any circumstances) is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof (or their application to other persons or sets of circumstances) shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

- 1.8 The permittee shall pay to the DEQ an annual fee based on a fee schedule established by the Mississippi Commission on Environmental Quality (i.e., the “Commission”). The fee schedule shall be set each year by order of the Commission in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

- (a) A portion of the fee shall be based on the permittee’s annual quantity of emissions. The permittee shall elect for “actual emissions” or “allowable emissions” to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions.
 - (i) “Actual emissions” shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct

measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

- (ii) “Allowable emissions” are those emissions limited by this permit as well as those emissions not expressly limited by this permit but otherwise allowed by this permit, as represented in the Title V application.
- (iii) Notwithstanding paragraphs (i) and (ii), a minimum annual fee shall be assessed in accordance with the fee schedule established by the Commission when calculating this portion of the fee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(1).)

- (b) A portion of the fee shall be based on the complexity of this permit, as determined by the number of air regulations applicable to the permittee on the date of the fee calculation in accordance with the fee schedule established by the Commission. Only air regulations required to be addressed by this permit may be included in the annual fee schedule.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(2).)

- (c) By July 1 of each year, the permittee shall submit a completed annual fee reporting form to the DEQ accompanied by all necessary calculations and supporting information to verify actual emissions. If the annual fee reporting form is not filled out completely and accurately or certified in accordance with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E., “allowable emissions” or other information necessary to determine the appropriate annual fee shall be used in the fee calculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(c).)

- (d) If the Commission determines that there is not sufficient information available to the permittee to accurately complete and submit the annual fee reporting form by July 1, but such information becomes available and is submitted to the DEQ after July 1, the fee calculation and assessment may be altered according to the annual fee schedule. No fee actually paid to the DEQ shall be refunded due to a change in the fee calculation.

If a fee is recalculated such that the amount assessed for an annual period is reduced and the permittee has already paid all or a portion of the fee, the revised fee assessment may not be reduced to an amount less than what the permittee has already paid regardless of the results of the recalculation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.B(3)(d).)

- (e) The fee shall be due September 1 of each year. However, the permittee may elect a quarterly payment method of four (4) equal payments with the payments due September 1, December 1, March 1 and June 1. The permittee shall notify the DEQ that the quarterly payment method will be used by September 1.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1).)

- (f) If at any time within the year the Commission determines that the information submitted by the permittee is insufficient or incorrect, the DEQ will notify the permittee of the deficiencies and the adjusted fee schedule. Past due fees as a result of the adjusted fee assessment will be due at the time of the next scheduled quarterly payment.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(b).)

- (g) If an annual fee is not paid within thirty (30) days after the due date, a penalty of ten (10) percent of the amount due shall at once accrue and be added thereto. If the fee is not paid in full (including any interest and penalty within sixty (60) days of the due date), the Permit Board may revoke the permit upon proper notice and hearing as required by law.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.E(1)(a).)

- (h) If the permittee disagrees with the calculation or applicability of an annual fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

- 1.11 The permittee shall allow the DEQ (or an authorized representative), upon the presentation of credentials and other documents as may be required by law, to perform the following:

- (a) Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy (at reasonable times) any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Federal Act, sample or monitor (at reasonable times) substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance upon satisfying one of the following conditions:

- (a) Such applicable requirements are included and are specifically identified in the permit; or
- (b) The Permit Board, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the permittee and the permit includes such determination (or a concise summary thereof).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

- 1.15 Nothing in this permit shall alter or affect the following:

- (a) The provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
- (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required to register such a plan pursuant to Section 112(r) of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one that is submitted at least six (6) months prior to the date of permit expiration.

If the permittee submits a timely and complete application for permit issuance (including for renewal), the failure to have a Title V permit is not a violation of the applicable regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.A(1)(c), R. 6.4.B., and 6.4.C(2).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (Ref.: Section 502(b)(10) of the Federal Act) if the following criteria are met:

- (a) The changes are not modifications under any provision of Title I of the Federal Act;
- (b) The changes do not exceed the emissions allowable under this permit;
- (c) The permittee provides the Administrator and the Department with written notification in advance of the proposed changes [i.e., at least seven (7) days or such other time frame as provided in other regulations for emergencies] and the notification includes the following information:
 - (1) A brief description of the change(s),
 - (2) The date on which the change will occur,
 - (3) Any change in emissions, and

(4) Any permit term or condition that is no longer applicable as a result of the change;

(d) The permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an “Air Pollution Emergency Episode”, the permittee will be required to operate in accordance with either the permittee’s prepared “Emission Control Action Program(s)” or, in the absence of a prepared Emission Control Action Program, the appropriate requirements and “Emission Reduction Objectives” specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 3. – “Regulations for the Prevention of Air Pollution Emergency Episodes” – for the level of emergency declared and the permittee’s source of air contamination.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the permittee’s facility may require a Permit to Construct in accordance with the provisions specified in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. – “Permit Regulations for the Construction and/or Operation of Air Emissions Equipment” – and may require modification of this permit in accordance with Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6. – “Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act.”

“Modification” is defined as any physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) Routine maintenance, repair, and replacement;
- (b) Use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the “Federal Energy Supply and Environmental Coordination Act of 1974” (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the “Federal Power Act”;
- (c) Use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) Use of an alternative fuel or raw material by a stationary source which:
 - (1) The source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.; or

- (2) The source is approved to use under any permit issued under Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. and/or Ch. 5.;;
- (e) An increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to Regulation 11 Miss. Admin. Code Pt. 2, Ch. 2. or Ch. 5.; or
- (f) Any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

1.21 An administrative permit amendment may be made by the Permit Board authorizing changes in ownership or operational control consistent with the following procedure:

- (a) The Permit Board shall take action within sixty (60) days after receipt of a completed request for a permit transfer, unless a public hearing is scheduled. The Permit Board may incorporate such changes without providing notice to the public or affected State(s) provided that it designates any such permit revision as having been made pursuant to this paragraph.
- (b) A permit transfer shall be approved upon satisfaction of the following:
 - (1) The applicant for transfer approval can demonstrate to the Permit Board it has the financial resources, operational expertise, and environmental compliance history over the last five (5) years to insure compliance with the terms and conditions of the permit to be transferred, except where this conflicts with State Law, and
 - (2) The Permit Board determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the DEQ.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4)(a) and (b).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Act. All terms and conditions in this permit, including any provisions designed to limit the permittee's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for

forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance.

Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or an Emergency Air Pollution Episode Alert imposed by the Executive Director of DEQ; and must meet the following buffer zones:

- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
- (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within fifty (50) yards of an occupied dwelling.
- (c) Burning must not occur within 500 yards of commercial airport property, private airfields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of the upset;
 - (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within five (5) working days of the time the upset began, the source submitted a written report to the Department describing the upset, the

steps taken to mitigate excess emissions or any other non-compliance, and the corrective actions taken and;

- (v) That as soon as practicable but no later than twenty-four (24) hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
 - (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
 - (3) This provision is in addition to any upset provision contained in any applicable requirement.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third-party enforcement actions.
- (b) Start-ups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (1) Start-ups and shutdowns are part of normal source operation. Emission limitations apply during start-ups and shutdowns unless source specific emission limitations or work practice standards for start-ups and shutdowns are defined by an applicable rule, regulation, or permit.
 - (2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in Regulation 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for start-ups and shutdowns. Source specific emission limitations or work practice standards established for start-ups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - (3) Where an upset as defined in Rule 1.2 occurs during start-up or shutdown, see the “Upset” requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements specified in 40 CFR Part 61, Subpart M (National Emission Standard for Asbestos), as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

EMISSION POINT	DESCRIPTION
AA-000	Facility-Wide (Amite BioEnergy, LLC – Wood Pellet Manufacturing Facility)
AA-100	Fugitive Emission Sources – Wood Yard Operations
AA-101	Log Debarker
AA-102	Log Chipper
AA-103	Wood Material Transfer and Handling Operations
AA-104	Green Wood Storage Pile
AA-105	Dry Fiber and Chip Storage Tent
AA-200	Wood Drying Operations
AA-201	One (1) Wet Electrostatic Precipitator (WESP) and one (1) Regenerative Thermal Oxidizer (RTO) (equipped with one (1) 24 MMBTU / hour natural gas-fired burner) [emissions from the Wood Chip Rotary Dryer and the 165 MMBTU / Hour Wood-Fired Furnace are controlled]
AA-203a	165 MMBTU / Hour Wood-Fired Furnace
AA-203d	Wood-Fired Furnace Bypass Stack
AA-204a	Wood Chip Rotary Dryer
AA-204b	Wood Chip Rotary Dryer Bypass Stack
AA-300	Wood Pellet Operations
AA-301	One (1) Regenerative Catalytic Oxidizer (RCO) [equipped with one (1) 14 MMBTU / Hour natural gas-fired burner; emissions from the Primary Dry Hammermills, the Secondary Dry Hammermills, and the Pellet Mills / Pellet Coolers are controlled]
AA-302	Feed Silo for Primary Dry Hammermills
AA-303a	Six (6) Primary Dry Hammermill Pneumatic Systems A – F [each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-303b	Primary Hammermill Baghouse Bypass Stack

EMISSION POINT	DESCRIPTION
AA-304	Dry Shavings Truck Dump [equipped with a baghouse]
AA-305	Secondary Dry Hammermill Silo No. 1
AA-306	Secondary Dry Hammermill Silo No. 2
AA-307a	Three (3) Secondary Dry Hammermill Pneumatic Systems A – C [each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-307b	Secondary Hammermill Baghouse Bypass Stack
AA-308a	Six (6) Pellet Mill / Cooler Pneumatic Systems A – F [each system comprised of two (2) pellet mills and one (1) pellet cooler; each system equipped with a baghouse filter to control particulate matter emissions; emissions from the baghouse filters are routed to the RCO (AA-301)]
AA-308b	Pellet Mill / Cooler Baghouse Bypass Stack
AA-309	Starch Storage Silo [equipped with a bin vent filter]
AA-400	Finished Pellet Operations
AA-401	Two (2) Pellet Storage Silos and Pellet Truck Load-Out System [emissions from all sources are controlled by a common baghouse; collected wood solids from the common baghouse are pneumatically conveyed to the “Screened Materials Return System”]
AA-500	Emergency Engines
AA-501	250 HP (187 kW) Diesel-Fired Emergency Pump Engine [total heat input: 0.64 MMBTU / hour; manufactured in 2013]
AA-502	402 HP (300 kW) Diesel-Fired Emergency Generator Engine [total heat input: 0.81 MMBTU / hour; manufactured in 2015]

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. FACILITY-WIDE EMISSION LIMITATIONS & STANDARDS

3.A.3 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial, or waste disposal process, which exceeds forty (40) percent opacity subject to the exceptions provided in (a) and (b):

- (a) Start-up operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per start-up in any one hour and not to exceed three (3) start-ups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed sixty (60) percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.4 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.A.5 The permittee shall not cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (a) The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (b) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of Regulation 11 Miss. Admin. Code Pt. 2, Ch. 1, the Commission may order such corrected in a way that all air and gases or air and gas-borne material leaving the building or equipment are controlled or removed prior to discharge to the open air.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.C.)

B. EMISSION POINT SPECIFIC EMISSION LIMITATIONS & STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).	3.B.1	PM (filterable)	E = 4.1 (p ^{0.67})
	11 Miss. Admin. Code Pt. 2, R. 8.1 40 CFR Part 63, Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j) 40 CFR 63.40(b), 63.43(g)(2)(iv), (k), and (l); Subpart B	3.B.2	HAPs	General Applicability
AA-200 AA-300 AA-400 AA-500	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued November 26, 2012 and modified March 9, 2021 (PSD Avoidance Limits)	3.B.3	PM (filterable)	245.0 tpy (Rolling 12-Month Total)
			PM ₁₀ / PM _{2.5} (filterable + condensable)	245.0 tpy (Rolling 12-Month Totals)
			NO _x	245.0 tpy (Rolling 12-Month Total)
			VOCs	245.0 tpy (Rolling 12-Month Total)
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued November 26, 2012; modified March 9, 2021, and [PTC ISSUED DATE] (PSD Avoidance Limit)	3.B.4	CO	249.0 tpy (Rolling 12-Month Total)
AA-201	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.5	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	Operational Requirements (WESP – RTO)
AA-201	40 CR 63.42(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10). as established in the Permit to Construct issued [PTC ISSUED DATE]	3.B.6	HAPs	96.0% Destruction Efficiency (RTO)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-203a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.7	Fuel Source Restrictions	Combust Only Uncontaminated Wood Waste or WESP By-Products (diesel fuel may be used during cold start-up activities)
AA-204a AA-303a AA-307a AA-308a	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) 40 CFR 64.2(a); CAM	3.B.8	PM / PM ₁₀ / PM _{2.5} VOCs HAPs	General Applicability
AA-204a	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.9	Dried Wood Chip Throughput	467,316.0 ODT / Year (Rolling 12-Month Total)
AA-203d AA-204b	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.10	CO NO _x PM / PM ₁₀ / PM _{2.5} VOCs HAPs	<i>Start-Up and Shutdown Requirements:</i> Bypass Furnace-Related Emissions for ≤ 100.0 Hours <i>Idle Mode Requirements:</i> Bypass Furnace-Related Emissions for ≤ 500.0 Hours (Rolling 12-Month Totals)
AA-300	11 Miss. Admin. Code Pt. 2, R.2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.11	Wood Pellet Production	624,700.0 ODT / Year (Rolling 12-Month Total)
AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.12	VOCs HAPs	Operational Requirements (RCO)
	40 CR 63.42(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.13	HAPs	96.0% Destruction Efficiency (RCO)
AA-300 AA-400	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE]	3.B.14	PM / PM ₁₀ / PM _{2.5} (filterable only)	Operational Requirements (Baghouses)
AA-500	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.15	PM	0.6 lb. / MMBTU per Hour Heat Input

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limitation / Standard
AA-500	40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Combustion Engines 40 CFR 60.4200(a)(2); 60.4218, and Table 8; Subpart III	3.B.16	NMHC + NO _x CO PM (filterable)	General Applicability
	40 CFR 60.4207(b); Subpart III	3.B.17	Diesel Fuel Requirement	15 ppm Maximum Sulfur Content; and 40 Min. Cetane Index <u>or</u> 35% Max. Aromatic Content
	40 CFR 60.4211(f)(1) – (3); Subpart III	3.B.18	Hours of Operation	100 Hours / Calendar Year for Maintenance and Testing 50 Hours / Calendar Year for Non-Emergency Situations
	40 CFR Part 63, Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines 40 CFR 63.6590(c)(1), Subpart ZZZZ	3.B.19	HAPs	General Applicability
AA-501	40 CFR 60.4205(c), 60.4206, and 60.4211(c); Subpart III	3.B.20	NMHC + NO _x PM (filterable)	Purchase Engine Certified to Emission Standards
AA-502	40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(c); Subpart III	3.B.21	NMHC + NO _x CO PM (filterable) Opacity	

3.B.1 For Emission Point AA-000 (Facility-Wide), except as otherwise specified herein, the permittee shall limit the emissions of particulate matter (PM) to no more than the rate determined by the following relationship:

$$E = 4.1 (p^{0.67})$$

where “*E*” is the emission rate in pounds per hour and “*p*” is the process weight input rate in tons per hour. Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.F.(1).)

3.B.2 For Emission Point AA-000 (Facility-Wide), the permittee is subject to and shall comply with the applicable requirements specified in Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1 as well as 40 CFR Part 63, Subpart B [Requirements for

Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)], and 40 CFR Part 63, Subpart A [General Provisions].

On and after the date of start-up, the permittee shall comply with all applicable requirements specified in the MACT determination. Moreover, the permittee shall comply with all requirements in the final Notice of MACT Approval, including (but not limited to) any MACT emission limit, MACT work practice standard, notification, applicable operation and maintenance, performance testing, monitoring, recordkeeping, and reporting.

Upon obtaining a MACT determination, the permittee shall be deemed in compliance with Section 112(g)(2)(B) of the Clean Air Act only to the extent that the permittee is in compliance with all requirements set forth in the final Notice of MACT Approval. Any violation of such requirements by the permittee shall be deemed by the MDEQ and EPA to be a violation of the prohibition on construction or reconstruction in section 112(g)(2)(B) for whatever period the permittee is determined to be in violation of such requirements and shall subject the permittee to appropriate enforcement action under the Clean Air Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 8.1.)

(Ref.: 40 CFR 63.40(b), 63.43(g)(2)(iv), (k), and (l); Subpart B)

- 3.B.3 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-400 (Finished Pellet Operations) and AA-500 (Emergency Engines), the permittee shall respectively limit the total emission of filterable particulate matter (PM), particulate matter less than 10 microns (μm) in diameter (PM_{10} ; filterable + condensable), particulate matter less than 2.5 μm in diameter ($\text{PM}_{2.5}$; filterable + condensable), nitrogen oxides (NO_x), and volatile organic compounds (VOCs) from all applicable sources to no more than 245.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), as established in Permit to Construct issued November 26, 2012, and modified March 9, 2021 – PSD Avoidance Limits)

- 3.B.4 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-400 (Finished Pellet Operations) and AA-500 (Emergency Engines), the permittee shall limit the total emission of carbon monoxide (CO) from all applicable sources to no more than 249.0 tons per year (tpy) based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), as established in the Permit to Construct issued November 26, 2012; modified on March 9, 2021, and [PTC ISSUED DATE] – PSD Avoidance Limit)

- 3.B.5 For Emission Point AA-201 (WESP – RTO Control System), the permittee shall at all times operate the wet electrostatic precipitator – regenerative thermal oxidizer (WESP –

RTO when the Wood Chip Rotary Dryer (Emission Point AA-204a) is operational **and** drying wood chip material.

Except for periods of malfunction, the permittee shall cease operation of the Wood Chip Rotary Dryer for any period in which wood chip material is being dried and either air pollution control device is non-operational. For any period of malfunction in which wood chip material is being dried and either air pollution control device is non-operational, the permittee shall minimize uncontrolled emissions from the Wood Chip Rotary Dryer in accordance with Condition 3.D.2 and the “Start-up, Shutdown, and Malfunction Plan” (SSMP) required by Condition 5.B.3.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.6 For Emission Point AA-201 (WESP – RTO Control System), the permittee shall at all times operate the regenerative thermal oxidizer (RTO) in such a manner as to achieve at minimum ninety-six (96.0) percent destruction efficiency of total hazardous air pollutants (HAPs) (measured in “organic carbon as propane”) across the RTO.

The use of the RTO to achieve 96.0% destruction efficiency of total HAPs has been determined to satisfy the case-by-case MACT requirements of Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1.

(Ref.: 40 CR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued [PTC ISSUED DATE])

- 3.B.7 For Emission Point AA-203a (Wood-Fired Furnace), the permittee shall only utilize uncontaminated wood material or WESP by-products (i.e., sludge or washdown waste) as the primary fuel sources for the furnace.

Additionally, the permittee may utilize diesel fuel as an accelerant for any cold start-up of the furnace. To the best extent practicable, the permittee shall minimize the volume of diesel fuel used during any cold start-up period.

For the purpose of this permit, “*uncontaminated wood material*” is defined as any by-product generated from the processing of harvested timber to produce wood pellets (bark, green wood chips, dried wood chips, sawdust, wood pellets that do not meet customer specifications, etc.) that does not possess an artificial coating or residue.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.8 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 64, Compliance Assurance Monitoring (CAM).

(Ref.: 40 CFR 64.2(a); CAM)

- 3.B.9 For Emission Point AA-204a (Wood Chip Rotary Dryer), the permittee shall limit the throughput of wood chips dried to no more than 467,316.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

For the purpose of this permit, an “oven-dried ton” equates to a ton of wood at zero percent (0%) moisture.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.10 For Emission Points AA-203a (Wood-Fired Furnace) and AA-204a (Wood Chip Rotary Dryer), the permittee shall at all times direct emissions from the rotary dryer and the furnace to the WESP – RTO (Emission Point AA-201), except for the following periods (as applicable):

- (a) During periods of start-up in which the Wood Chip Rotary Dryer does not contain wood chip material and/or periods of furnace shutdown, the permittee may vent emissions from the furnace to either the Furnace Bypass Stack (Emission Point AA-203d) or the Wood Chip Rotary Dryer Bypass Stack (Emission AA-204b) in accordance with the SSMP required by Condition 5.B.3.

The total duration for all periods in which emissions from the furnace are vented to the Furnace Bypass Stack (Emission Point AA-203d) and the Wood Chip Rotary Dryer Bypass Stack (Emission AA-204b) shall not exceed one hundred (100) hours during any rolling 12-month period.

Once 100 hours are attained, the permittee shall either direct emissions from the furnace to the WESP – RTO Control System (if fully operational) or cease operation of the furnace.

- (b) During periods of furnace idle mode, the permittee may vent the emissions from the furnace to the Furnace Bypass Stack (Emission Point AA-203d) for no more than five hundred (500) hours based on a rolling 12-month total.

Once 500 hours are attained, the permittee shall either direct emissions from the furnace to the WESP – RTO Control System (if fully operational) or cease operation of the furnace.

For the purpose of this permit, “idle mode” is defined as the operation of the furnace at a heat input rate established in accordance with the SSMP required by Condition 5.B.3.

The use of the Furnace Bypass Stack or the Wood Chip Rotary Dryer Bypass Stack for any purpose other than the scenarios outlined in paragraphs (a) and (b) of this condition

shall constitute a deviation and is subject to the deviation reporting requirements specified in Condition 5.A.5.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021 and modified [PTC ISSUED DATE])

- 3.B.11 For Emission Point AA-300 (Wood Pellet Operations), the permittee shall limit the total production of wood pellets to no more than 624,700.0 oven-dried tons (ODT) per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.12 For Emission Point AA-301 (RCO Control System), the permittee shall at all times operate the regenerative catalytic oxidizer (RCO) and the applicable baghouse filter(s) when the Primary Dry Hammermill Systems (Emission Point AA-303a), the Secondary Dry Hammermill Systems (Emission Point AA-307a), and/or the Pellet Mill / Coolers Systems (Emission Point AA-308a) are operational **and** processing dried wood chip material.

Except for periods of malfunction, the permittee shall cease operation of any process source(s) for any period in which dried wood chip material is being processed and any applicable air pollution control device is non-operational. For any period of malfunction in which dried wood chip material is being processed and any applicable air pollution control device is non-operational, the permittee shall minimize uncontrolled emissions from the process source(s) in accordance with Condition 3.D.2 and the SSMP required by Condition 5.B.3.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.13 For Emission Point AA-301 (RCO Control System), the permittee shall at all times operate the regenerative catalytic oxidizer (RCO) in such a manner as to achieve at minimum ninety-six (96.0) percent destruction efficiency of total HAPs (measured in “organic carbon as propane”) across the RCO.

The use of the RCO to achieve 96.0% destruction efficiency of total HAPs has been determined to satisfy the case-by-case MACT requirements of Mississippi Administrative Code, Title 11, Part 2, Chapter 8, Rule 8.1.

(Ref.: 40 CR 63.43(c)(2); Subpart B and 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in the Permit to Construct issued [PTC ISSUED DATE])

- 3.B.14 For Emission Points AA-300 (Wood Pellet Operations) AA-400 (Finished Pellet Operations), the permittee shall at all times operate each baghouse when the corresponding process source is operational **and** storing / transferring material. For any period in which a baghouse is non-operational, the permittee shall cease operation from

associated process source(s) until such time that the applicable control device returns to operational status.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10), as established in Permit to Construct issued March 9, 2021, and modified [PTC ISSUED DATE])

- 3.B.15 For Emission Point AA-500 (Emergency Engines), the maximum emission of ash and/or particulate matter (PM) from each engine shall not exceed 0.6 pounds per MMBTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D.(1)(a).)

- 3.B.16 For Emission Point AA-500 (Emergency Engines), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR Part 60, Subpart A – General Provisions (as required in Table 8 of Subpart III).

(Ref.: 40 CFR 60.4200(a)(2), 60.4218, and Table 8; Subpart III)

- 3.B.17 For Emission Point AA-500 (Emergency Engines), the permittee shall only use diesel fuel in each engine that meets the following requirements (on a per-gallon basis):

- (b) A maximum sulfur content of 15 parts per million (ppm); and
- (b) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent (vol. %).

(Ref.: 40 CFR 60.4207(b); Subpart III)

- 3.B.18 For Emission Point AA-500 (Emergency Engines), any operation of the engine for any purpose other than emergency operation, maintenance and testing, and operation in non-emergency situations, as allowed in paragraph (c), is prohibited. If an engine is not operated in accordance with paragraphs (a) through (c) of this condition, the engine will not be considered an emergency engine under Subpart III and shall then meet all applicable requirements under Subpart III for non-emergency engines:

- (a) There is no time limit on the use of an engine in emergency situations.
- (b) The permittee may operate an engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company accompanied with the engine. Maintenance checks and readiness testing of an engine is limited to a maximum of one hundred (100) hours per calendar year. The permittee may petition the MDEQ for approval of additional hours to be used for maintenance checks and readiness testing. However, a petition is not required if the permittee

maintains records indicating that Federal, State, and local standards require maintenance and testing of the engine beyond 100 hours per calendar year.

- (c) The permittee may operate an engine for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(Ref.: 40 CFR 60.4211(f)(1) – (3), Subpart IIII)

- 3.B.19 For Emission Point AA-500 (Emergency Engines), the permittee is subject to and shall comply with all applicable requirements found in 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.

As the engines are considered “new” and subject to 40 CFR Part 60 – Subpart IIII, the permittee shall demonstrate compliance with Subpart ZZZZ by complying with the applicable requirements of Subpart IIII. No further requirements apply under Subpart ZZZZ.

(Ref.: 40 CFR 63.6590(c)(1), Subpart ZZZZ)

- 3.B.20 For Emission Point AA-501 (Emergency Pump Engine), the permittee shall purchase the engine that complies with the following emission standards:

- (a) Non-methane Hydrocarbon + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour (or 3.0 grams per horsepower-hour); and
- (b) Particulate Matter (PM): 0.20 grams per kilowatt-hour (or 0.15 grams per horsepower-hour).

The engine shall be installed and configured according to the manufacturer's emission-related specifications. Additionally, the permittee shall operate the engine in such a manner as to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(c), 60.4206, and 60.4211(c); Subpart IIII)

- 3.B.21 For Emission Point AA-502 (Emergency Generator Engine), the permittee shall purchase the engine that complies with the following emission standards:

- (a) Non-Methane Hydrocarbons + Nitrogen Oxides (NMHC + NO_x): 4.0 grams per kilowatt-hour;
- (b) Carbon Monoxide (CO): 3.5 grams per kilowatt-hour; and

(c) Particulate Matter (PM): 0.20 grams per kilowatt-hour.

Additionally, the permittee shall not discharge into the atmosphere any smoke exhaust that exceeds the following opacity standards:

(d) 20 percent (20%) during the acceleration mode;

(e) 15 percent (15%) during the lugging mode; and

(f) 50 percent (50%) during the peaks in either the acceleration or lugging modes.

The engine shall be installed and configured according to the manufacturer's emission-related specifications. Additionally, the permittee shall operate the engine in such a manner as to achieve the noted emission standards over the entire life of the engine.

(Ref.: 40 CFR 60.4205(b), 60.4202(a)(2), 60.4206, and 60.4211(c); Subpart IIII)

C. INSIGNIFICANT AND TRIVIAL ACTIVITY EMISSION LIMITATIONS & STANDARDS

Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lb. / MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.C.2	SO ₂	4.8 lb. / MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter (PM) from fossil fuel burning installations of less than ten (10) million BTU (MMBTU) per hour heat input shall not exceed 0.6 pounds per MMBTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per MMBTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

D. WORK PRACTICE STANDARDS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter	Limit / Standard
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued [PTC ISSUED DATE]	4.1	PM / PM ₁₀ / PM _{2.5} (filterable only)	Minimize the Off-Site Migration of Fugitive Dust
AA-200 AA-300	40 CFR 63.2 and 63.6(e)(1)(i) – (ii); Subpart A	4.2	HAPs	General Duty Clause
AA-500	40 CFR 60. 4211(a); Subpart III	4.3	NMHC + NO _x CO PM (filterable)	Conduct Best Management Practices

3.D.1 For Emission Point AA-000 (Facility-Wide), the permittee shall develop, implement, and maintain reasonable work practices to minimize (to the best extent practicable) the off-site migration of fugitive dust from each applicable operation, process, handling, storage, or transportation activity to comply with the requirements specified in Condition 3.A.3.

Such work practices may include (but not limited to) the following measures:

- (a) The application of water and/or a dust suppressant onto any unpaved or uncovered ground surface while the facility is in operation and dry conditions exist (or when fugitive dust is observed).
- (b) The implementation of an on-site vehicle speed limit for areas with any unpaved or uncovered ground surface.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10)., as established in Permit to Construct issued [PTC ISSUED DATE])

3.D.2 For Emission Points AA-200 (Wood Drying Operations) and AA-300 (Wood Pellet Operations), the permittee shall at all times operate and maintain each applicable source (including associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions (including periods of start-up, shutdown, and malfunction).

During a period of start-up, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from an emission source to the greatest extent, which is consistent with safety and good air pollution control practices. However, the general duty to minimize emissions during a period of start-up, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been

achieved.

The determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ that may include (but not limited to) monitoring results, review of operation and maintenance procedures [including the SSMP required by Condition 5.B.3], review of operation and maintenance records, and inspection of the source.

Malfunctions must be corrected as soon as practicable after their occurrence. To the extent that an unexpected event arises during a start-up, shutdown, or malfunction, the permittee shall comply by minimizing emissions during such a start-up, shutdown, malfunction, and shakedown event consistent with safety and good air pollution control practices.

For the purpose of this permit, a “malfunction” means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes (or has the potential to cause) the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 63.2 and 63.6(e)(1)(i) – (ii); Subpart A)

3.D.3 For Emission Point AA-500 (Emergency Engines), the permittee shall adhere to the following work practices:

- (a) Operate and maintain each engine and control device (if any) according to the manufacturer’s emission-related written instructions;
- (b) Change only those emission-related settings that are permitted by the manufacturer;
- (c) Meet the requirements of 40 CFR Part 1068 (as applicable); and
- (d) If the permittee does not operate and maintain each engine according to the manufacturer’s emission-related written instruction, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance in accordance with 40 CFR 60.4211(g), Subpart III.

(Ref.: 40 CFR 60.4211(a) and (g); Subpart III)

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with terms and conditions contained in this permit (including emission limitations, standards, or work practices) by January 31 of each year for the preceding calendar year. If the permit was reissued or modified during the course of the preceding calendar year, the compliance certification shall address each version of the permit. Each compliance certification shall include the following information:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), and (d).)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. GENERAL MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring the following information:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 of each calendar year for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with Regulation 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

For applicable periodic reporting requirements in 40 CFR Parts 60, 61, and 63, the permittee shall comply with the deadlines in this condition for reporting conducted on a semiannual basis. Additionally, any required quarterly reports shall be submitted by the end of the month following each calendar quarter period (i.e., April 30, July 31, October 31, and January 31), and any required annual reports shall be submitted by January 31 following each calendar year.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
(Ref.: 40 CFR 60.19(c), 61.10(g), and 63.10(a)(5))

- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements (including those attributable to upsets or malfunctions), the probable cause of such deviations, and any corrective actions or preventive measures taken. The report shall be made within five (5) working days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(10) and R. 6.3.A(3)(c)(2).)

- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements (if applicable). All test methods shall be those respective versions (or their equivalents) approved by the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.A.8 Unless otherwise specified in Section 4 of this permit, the monitoring, testing, recordkeeping, and reporting requirements specified in Section 5 herein supersede the requirements of any preceding permit to construct and/or operate upon permit issuance.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. SPECIFIC MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-000 (Facility-Wide)	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.1	PM / PM ₁₀ / PM _{2.5} (filterable only)	Maintain a Dust Management Plan
AA-200 AA-300	40 CFR 63.6(e)(3)(i); Subpart A 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.2	HAPs	Maintain and Implement a Start-Up, Shutdown, and Malfunction Plan
AA-200 AA-300 AA-400 AA-500	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.3	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable) NO _x CO VOCs	Calculate Emissions (Monthly and Rolling 12-Month Totals)
AA-201 AA-303a AA-307a AA-308a	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.4	Secondary Voltage Secondary Current Differential Pressure Drop	Continuous Monitoring System Requirements
AA-201 AA-301	40 CFR 63.42(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.5	Firebox Temperature	Continuous Temperature Monitoring System Requirements
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.6	HAP Destruction Efficiency PM / PM ₁₀ / PM _{2.5} (filterable) Condensable PM CO NO _x VOCs Target HAPs	Conduct Routine Performance Testing Develop Operating Limits
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.7	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable) NO _x CO VOCs	Establish Site-Specific Emission Factors

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-201 AA-301	40 CFR 63.42(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.8	Firebox Temperature	Continuously Monitor the RTO and RCO (3-Hour Block Average)
	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.9	PM / PM ₁₀ / PM _{2.5}	Conduct Weekly Visible Emission Observations / Evaluations
AA-201	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.10	Secondary Voltage Secondary Current	Continuously Monitor for the WESP (3-Hour Block Average)
AA-203a	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.11	Uncontaminated Wood Material	Recordkeeping Requirements
AA-203d AA-204b	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.12	Hours of Duration	Monitor Date, Time, and Duration of Start-Up and Shutdown Periods (Monthly) Calculate Total Duration of All Start-Up and Shutdown Periods (Rolling 12-Month Total)
AA-203d	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.13	Hours of Duration	Monitor Date, Time, and Duration of Idle Mode Periods (Monthly) Calculate Total Duration of All Idle Mode Periods (Rolling 12-Month Total)
AA-204a AA-303a AA-307a AA-308a	40 CFR 64.7(b) and (c); CAM	5.B.14	Operation & Maintenance	Operation and Maintenance Requirements for Monitoring System(s)
	40 CFR 64.7(d); CAM	5.B.15	Corrective Action	Perform Corrective Action Response to an Excursion / Exceedance of CAM Indicator
	40 CFR 64.8; CAM	5.B.16	QIP	Develop a Quality Improvement Plan (QIP) (Upon Request)
	40 CFR 64.9(b); CAM	5.B.17	CAM Records	Record and Maintain CAM Records (As Specified)
	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.18	Firebox Temperature Secondary Voltage Secondary Current	<i>CAM Requirements:</i> Continuous Parameter Monitoring
AA-204a	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.19	Dried Wood Chips	Monitor Total Throughput (Monthly and Rolling 12-Month Total)
AA-300 AA-400	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.20	PM / PM ₁₀ / PM _{2.5} (filterable only)	Conduct an Inspection on Each Baghouse Weekly
AA-300	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.21	Wood Pellets	Monitor Total Production (Monthly and Rolling 12-Month Total)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Monitoring / Recordkeeping Requirement
AA-301	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.22	Catalytic Reactivity Structural Integrity	Conduct Routine Testing on Catalytic Media in the RCO
AA-303a AA-304 AA-307a AA-308a AA-400	11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.23	Differential Pressure Drop	Monitor Each Baghouse Filter Daily
AA-303a AA-307a AA-308a	40 CFR 64.3(a), (b), and 64.6(c); CAM	5.B.24	Differential Pressure Drop	<i>CAM Requirements:</i> Daily Parameter Monitoring
AA-500	40 CFR 60.4209(a); Subpart III 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).	5.B.25	Emergency Engine Status	Monitor the of Hours of Operation Monthly (Emergency and Non-Emergency)
	40 CFR 60.4114(a)(2)(i) – (iii); Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.B.26	NMHC + NO _x CO PM	Recordkeeping Requirements
AA-500	40 CFR 60.4211(g)(2); Subpart III	5.B.27	NMHC + NO _x CO PM	Perform Additional Compliance Actions (As Applicable)

5.B.1 For Emission Point AA-000 (Facility-Wide), the permittee shall maintain a “Dust Management Plan” (DMP) (dated March 2022) that details the work practices implemented in accordance with Condition 4.1 to minimize the off-site migration of fugitive dust.

Additionally, the permittee shall include within the DMP any associated monitoring, compliance action(s), and/or applied frequency for each implemented work practice.

As deemed necessary, the permittee may revise the DMP to address changes to applicable operations and/or to incorporate additional best management practices.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.2 For Emission Point AA-000 (Facility-Wide), the permittee shall implement and maintain the “Start-Up, Shutdown, and Malfunction Plan” (SSMP) (dated September 27, 2024) for the operation and maintenance of applicable emissions equipment during periods of start-up, shutdown, and malfunction.

As deemed necessary, the permittee may revise the SSMP to address changes to applicable operations and/or to incorporate additional best management / maintenance

practices for the purpose of ensuring the following requirements:

- (a) At all times, the permittee shall operate and maintain all applicable sources (including all associated air pollution control and monitoring equipment) in a manner that satisfies the general duty to minimize emissions established in Condition 3.D.2;
- (b) The permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize the excess emission of HAPs; and
- (c) Reduce the reporting burden associated with periods of start-up, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(Ref.: 40 CFR 63.6(e)(3)(i); Subpart A)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.3 For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-400 (Finished Pellet Operations), and AA-500 (Emergency Engines), the permittee shall calculate and maintain the total respective emission of filterable PM, PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), NO_x, CO, and VOCs in tons from all applicable sources on both a monthly and rolling 12-month total basis in accordance with the following requirements:

- (a) The permittee shall calculate emissions from WESP – RTO Control System (Emission Point AA-201) and the RCO Control System (Emission Point AA-301) using applicable production data, applicable parametric monitoring data, and the most recently established site-specific emission factors.
- (b) For any source in which emissions are not controlled by the WESP – RTO Control System (Emission Point AA-201) or the RCO Control System (Emission Point AA-301), the permittee shall either assume actual emissions are equivalent to potential emissions or utilize actual applicable throughput / production data in addition to applicable emission factors and device removal efficiency factors (as applicable).
- (c) The permittee shall include any period in which emissions bypass an applicable air pollution control device within the calculation of total pollutant emissions.
- (d) Unless otherwise specified herein, the permittee shall maintain records of all reference data utilized to calculate emissions (operational data, applicable emission factors, engineering judgement determinations, stack testing results, etc.).

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.4 For Emission Points AA-201 (WESP – RTO Control System), AA-303a (Primary Dry Hammermill Systems), Emission Point AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall calibrate, operate,

maintain, and inspect a continuous monitoring system in accordance with the manufacturer's recommendations for the specified operating parameter on the following air pollution control devices:

- (a) Wet Electrostatic Precipitator (WESP) – Secondary voltage (in volts) and secondary current (in amps); and
- (b) Baghouse Filter – differential pressure drop (in inches of water).

Additionally, the permittee shall maintain documentation that details the manufacturer's instructions / recommendations for each noted control device.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.5 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall operate and maintain the continuous temperature monitoring system in accordance with the following specifications:

- (a) The continuous monitoring system shall be capable of completing a minimum one cycle of operation (i.e. sampling, analyzing, and recording) for each successive 15-minute period;
- (b) The permittee shall maintain the equipment for the continuous monitoring system at all times including (but not limited to) the parts necessary for routine repairs of equipment;
- (c) The permittee shall record and maintain the results of each inspection and validation check;
- (d) The permittee shall locate the temperature sensor in a position that provides a representative temperature;
- (e) The permittee shall use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the minimum required firebox temperature (whichever is larger);
- (f) The permittee shall validate the temperature sensor's reading on an annual basis in accordance with the manufacturer's specifications;
- (g) The permittee shall conduct validation checks using the procedures as specified in paragraph (f) of the condition any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and
- (h) The permittee shall inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosions at least quarterly.

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.6 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall demonstrate initial compliance with the total HAP destruction efficiency limits specified in Conditions 3.B.6 and 3.B.13 by conducting a performance test no later than [thirteen (13) months after issuance of this permit]. The permittee shall demonstrate subsequent compliance by conducting a performance test once every three (3) years [and not to exceed thirty-seven (37) months after the previously completed test].

With each total HAP destruction efficiency compliance demonstration, the permittee shall also evaluate the respective emission of methanol, formaldehyde, and acetaldehyde.

In addition, the permittee shall evaluate the emission of PM (filterable), PM₁₀ (filterable), PM_{2.5} (filterable), condensable PM, CO, and NO_x from each source by conducting performance testing once every five (5) years [and no later than sixty-one (61) months after the previously completed test].

The permittee shall perform each test in accordance with the following requirements (as applicable):

- (a) Unless otherwise specified herein, the permittee shall conduct a performance test in accordance with an applicable EPA-approved test method found in Appendix A of 40 CFR Part 60, Appendix M of 40 CFR Part 51, Appendix A of 40 CFR Part 63, or an applicable alternative test method approved by EPA prior to the testing event.
- (b) The permittee shall conduct a minimum of three (3) separate test runs for a performance stack test as specified in 40 CFR 63.7(e)(3), Subpart A.
- (c) The permittee shall evaluate emission of NO_x and CO concurrently.
- (d) The permittee shall evaluate the emission of condensable PM concurrently with the evaluation of PM₁₀ (filterable).
- (e) *For the RTO and RCO:* For each HAP destruction efficiency compliance demonstration, the permittee shall utilize EPA Test Method 25A to simultaneously measure total emissions at the inlet and outlet of each air pollution control device.
- (f) *For the RTO and RCO:* For each HAP destruction efficiency compliance demonstration, the permittee shall continuously monitor the firebox temperature during each of the required 1-hour test runs. However, the permittee may measure the temperature in multiple locations (e.g. one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature.

The minimum firebox temperature shall be established as the average of the three (3) minimum 15-minute firebox temperatures monitored during the three (3) test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

The permittee may establish a different minimum firebox temperature for the RTO or RCO by conducting a repeat performance test (in accordance with the applicable requirements specified in this condition) that demonstrates compliance with the HAP destruction efficiency standard.

- (g) *For the WESP:* For each PM₁₀ performance test, the permittee shall continuously monitor the secondary voltage and secondary current during each of the required 1-hour test runs.

The minimum secondary voltage and minimum secondary current shall be established as the average of the respective three (3) minimum 15-minute values monitored during the three (3) test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions. The secondary voltage and secondary current shall be used to calculate the power of each WESP field.

- (h) *For the RTO:* The permittee shall monitor and record hourly throughput data on the wood chips dried by the Wood Chip Rotary Dryer (Emission Point AA-204a) during a performance test.
- (i) *For the RCO:* The permittee shall monitor and record hourly throughput data in ODT of wood pellets produced during a performance test.

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.7 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall utilize both the test results and applicable throughput data collected during the testing event to determine site-specific emission factors for PM (filterable), PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), VOCs, NO_x, and CO in pounds per oven-dried tons (ODT) upon completing a performance test required by Condition 5.B.6 (as applicable). The permittee shall establish the emission factors in accordance with the following requirements:

- (a) The permittee shall establish a site-specific VOC emission factor for each control system based on EPA OTM-26:

$$EF_{VOC} = \frac{(\bar{M}_{OC \text{ (as propane)}} + \bar{M}_{Methanol} + \bar{M}_{Formaldehyde} + \bar{M}_{Acetaldehyde}) - 0.65(\bar{M}_{Methanol})}{\bar{M}_{Throughput}}$$

Where:

- EF_{VOC} = the site-specific emission factor for VOCs; in pounds per ODT;
- $\bar{M}_{OC (as propane)}$ = the average mass flow rate of organic carbon (as propane) emissions from applicable performance testing; in pounds per hour;
- $\bar{M}_{Methanol}$ = the average mass flow rate of methanol emissions from applicable performance testing; in pounds per hour;
- $\bar{M}_{Formaldehyde}$ = the average mass flow rate of formaldehyde emissions from applicable performance testing; in pounds per hour;
- $\bar{M}_{Acetaldehyde}$ = the average mass flow rate of acetaldehyde emissions from applicable performance testing; in pounds per hour; and
- $\bar{M}_{Throughput}$ = the average throughput rate of applicable material (i.e. green wood chips processed, dried wood chips, wood pellets) during performance testing; in ODT per hour.

- (b) *For the WESP – RTO Control System:* all site-specific emission factors shall be based on the pounds of pollutant per combined ODT of dried wood chips from the Wood Chip Rotary Dryer (Emission Point AA-204a).
- (c) *For the RCO Control System:* all site-specific emission factors shall be based on the pounds of pollutant per ODT of wood pellets produced.

If the converted results exceed any of the already approved site-specific emission factors, the permittee **shall** submit the new emission factors in accordance with Condition 6.4.

If the converted results are lower than the approved site-specific emission factors, the permittee **may** submit the new emission factors in accordance with Condition 6.4.

For the purpose of this condition, any modification of a site-specific emission factor shall become effective on the month corresponding with the applicable stack testing event. The MDEQ retains the right to modify a site-specific emission factor based on additional performance testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

5.B.8 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall demonstrate continuous compliance with the operating limits established in accordance with Condition 5.B.6(f) by monitoring and collecting temperature data from the RTO or RCO in accordance with the following specifications:

- (a) As appropriate, the permittee shall conduct all monitoring in continuous operation at all times the process unit is operating except during periods of monitor malfunctions, associated repairs, and required quality assurance or control activities

(including calibration checks and required zero and span adjustments – as applicable).

- (b) For the purpose of calculating data averages, the permittee **shall** not use data recorded during periods of monitoring malfunction, associated repair, out-of-control periods, and required quality assurance / control activities. However, the permittee **may** not use data recorded during periods of safety-related shutdown.

Data collected during all other periods shall be used in assessing compliance and operation of the RTO or RCO.

For the purpose of this permit, a monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calibrations constitutes a deviation from the monitoring requirements.

- (c) The permittee shall determine the 3-hour block average of all recorded readings calculated after every three (3) hours of operation as the average of the evenly spaced recorded readings in the previous three (3) operating hours [excluding the periods described in paragraphs (a) and (b) of this condition].
- (d) To calculate the data averages for each 3-hour averaging period, the permittee shall have at least seventy-five percent (75%) of the required recorded readings for that period using only recorded readings that are based on valid data.

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.9 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall perform a visible emission observation in accordance with EPA Test Method 22 (“Method 22”) on the exhaust of each source on a weekly basis during daylight hours and during representative operating conditions. Each observation shall be performed for a minimum of six (6) consecutive minutes.

If visible emissions are detected during an observation period, the permittee shall then immediately perform a visible emission evaluation (VEE) in accordance with EPA Test Method 9 (“Method 9”). In the event that a VEE is required but cannot be conducted, the permittee shall record a written explanation as to why it was not possible to perform the VEE immediately and shall conduct the VEE as soon as practicable.

The permittee shall maintain all documentation and information required by Method 22 and/or Method 9, any corrective actions taken to prevent or minimize emissions as a result of an evaluation, and the date / time when each observation / evaluation was conducted.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.10 For Emission Point AA-201 (WESP – RTO Control System), the permittee shall demonstrate continuous compliance with the operating limit established in accordance with Condition 5.B.6(g) by continuously monitoring and collecting the secondary voltage (in volts) and secondary current (in amps) for each field in the WESP to calculate the 3-hour block average power of each field.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.11 For Emission AA-203a (Wood-Fired Furnace), the permittee shall maintain documentation that certifies the wood combusted within the furnace complies with the definition of “*uncontaminated wood material*” (as specified in Condition 3.B.7) on a calendar year basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.12 For Emission Points AA-203d (Furnace Bypass Stack) and AA-204b (Rotary Dryer Bypass Stack), the permittee shall monitor and record the date, time, and duration of each start-up and/or shutdown period in which emissions from the furnace are diverted to denoted bypass stack. Additionally, the permittee shall calculate and record the total duration of all start-up and shutdown periods for the furnace in hours per year based on a rolling 12-month total.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.13 For Emission Points AA-203d (Furnace Bypass Stack), the permittee shall monitor and record the date, time, and duration of each period in which the furnace operates in idle mode. Additionally, the permittee shall calculate and record the total duration of all idle mode periods for the furnace in hours per year based on a rolling 12-month total.

During any period that the furnace operates in idle mode, the permittee shall monitor the volume of wood waste fed into the furnace and calculate the heat input rate during the bypass period and convert the heat input into an hourly heat input by dividing the heat input during the bypass period by the duration of the bypass period that occurred.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.14 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall comply with the following requirements for the monitoring required by the approved CAM Plan:

- (a) *Proper Maintenance*: The permittee shall maintain the monitoring, including (but not limited to) maintaining necessary parts for routine repairs of the monitoring equipment at all times.

- (b) *Continued Operation:* Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities [including calibration checks and required zero adjustments, and required span adjustments (as applicable)], the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used [including in data averaging and calculations or in fulfilling a minimum data availability requirement (as applicable)].

The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Ref.: 40 CFR 64.7(b) and (c); CAM)

- 5.B.15 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall restore operation of a pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions upon detecting an excursion or exceedance.

The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard (as applicable).

The determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include (but is not limited to) monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(Ref.: 40 CFR 64.7(d); CAM)

- 5.B.16 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), in addition to the excursion threshold outlined in each CAM Plan, the MDEQ may require the permittee to develop and implement a Quality

Improvement Plan (QIP) that contains the elements specified in 40 CFR 64.8(b).

The QIP shall be developed and implemented within one hundred eighty (180) days of written notification from the MDEQ that a QIP is required. The MDEQ may require the permittee make reasonable changes to the QIP if the QIP fails to address the cause of the control device performance problem or fails to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The implementation of a QIP shall not excuse the permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that applies.

(Ref.: 40 CFR 64.8; CAM)

- 5.B.17 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5.B.16 and any activities undertaken to implement a QIP, data used to document the adequacy of monitoring, and monitoring maintenance or corrective actions (as applicable).

As applicable, the records of monitoring data and monitoring performance data should include the date and time, who performed the analysis, analytical techniques or methods used, results and operating conditions at the time of the sampling or measurement. These records may be maintained in hard copy form or electronically, provided they are available for expeditious inspection and review.

(Ref.: 40 CFR 64.9(b); CAM)

- 5.B.18 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall continuously monitor the specified parameters for the following control devices in accordance with the CAM Plan found in Appendix B of this permit:

- (a) For Emission Point AA-201 (WESP – RTO Control System): firebox temperature, secondary voltage, and secondary current; and
- (b) For Emission Point AA-301 (RCO Control System): firebox temperature.

(Ref.: 40 CFR 64.3(a), (b) 64.6(c); CAM)

- 5.B.19 For Emission Point AA-204a (Wood Chip Rotary Dryer), the permittee shall monitor and record the throughput of dried wood chips from the dryer in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.20 For Emission Points AA-300 (Pellet Operations) and AA-400 (Finished Pellet Operations), the permittee shall perform and record an inspection that evaluates the performance capability of each baghouse filter, baghouse, and bin vent filter on a monthly basis. If a problem is noted during an inspection, the permittee shall perform the necessary maintenance to ensure operation of the control device as originally designed. Additionally, the permittee shall maintain on-site (to the extent practicable) sufficient components as is necessary to repair a baghouse filter, baghouse, or bin vent filter.

The permittee shall maintain documentation that details the date / time each inspection is performed, any noted problem that is experienced, and any maintenance (either corrective or preventative) performed to return a control device to operation as originally designed. Additionally, the permittee shall monitor and record each period of time (including the date and duration) in which a control device is non-operational on a monthly basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.21 For Emission Point AA-300 (Wood Pellet Operations), the permittee shall monitor and record the total production of wood pellets in ODT both on a monthly and a rolling 12-month total basis.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.22 For Emission Point AA-301 (RCO Control System), the permittee shall determine the effective life of the catalytic media in the RCO by evaluating the catalyst reactivity and structural integrity in accordance with the applicable vendor's specifications and/or recommendations no later than March 22, 2025. Thereafter, the permittee shall conduct subsequent testing no later than sixteen (16) months after the previously completed test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.23 For Emission Points AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), AA-308a (Pellet Mill / Cooler Systems), AA-304 (Dry Shavings Truck Dump), and AA-400 (Finished Pellet Operations), the permittee shall monitor and record the differential pressure drop (in inches of water) across each baghouse filter on a daily basis during active operation of the applicable source.

If a monitored pressure drop is outside the manufacturer's specifications and/or recommendations range for a baghouse filter, the permittee shall perform and record any corrective measures taken to return the baghouse to the recommended pressure drop range.

Additionally, the permittee shall maintain documentation for each baghouse filter that details the recommended differential pressure drop range specified by the respective

manufacturer.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.24 For Emission Points AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall monitor the differential pressure drop of each baghouse filter on a daily basis in accordance with the CAM Plan found in Appendix B of this permit.

(Ref.: 40 CFR 64.3(a), (b), and 64.6(c); CAM)

- 5.B.25 For Emission Point AA-500 (Emergency Engines), the permittee shall monitor and record (via a non-resettable hour meter) the hours of operation for each engine on a monthly basis for both emergency and non-emergency service. Additionally, the permittee shall maintain documentation that details what classified each occurrence as either an emergency or a non-emergency.

(Ref.: 40 CFR 60.4209(a); Subpart III)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(a)(2).)

- 5.B.26 For Emission Point AA-500 (Emergency Engines), the permittee shall maintain documentation that details the following information:

- (a) All notifications submitted must comply with Subpart III;
- (b) Any maintenance conducted on an engine; and
- (c) Documentation from the manufacturer that indicates an engine is certified to meet the emission standards specified in Condition 3.B.20 or 3.B.21.

(Ref.: 40 CFR 60.4114(a)(2); Subpart III)

- 5.B.27 For Emission Point AA-500 (Emergency Engines), the permittee shall demonstrate compliance through the emission standards specified in Condition 3.B.20 and 3.B.21 through the following actions **if** the permittee does not operate and maintain the engine according to the manufacturer's emission-related written instructions or the permittee changes emission-related settings in a way that is not permitted by the manufacturer:

- (a) Keep a maintenance plan, records of conducted maintenance, and (to the extent practicable) maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) The permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards in accordance with one of the following deadlines:
 - (1) Within one (1) year of start-up, or

- (2) Within one (1) year after the engine is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or
- (3) Within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

Any required performance test shall be conducted in accordance with the procedures outlined in 40 CFR 60.4212(a) – (c); Subpart III (as applicable).

(Ref.: 40 CFR 60.4211(g)(2); Subpart III)

C. SPECIFIC REPORTING REQUIREMENTS

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-000 (Facility-Wide)	40 CFR 63.42(c)(2); Subpart B 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).	5.C.1	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable) NO _x CO VOCs Dried Wood Chips Wood Pellets Hours of Duration	Submit a Semi-Annual Monitoring Report
AA-201 AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.2	PM (filterable) PM ₁₀ / PM _{2.5} (filterable + condensable) NO _x CO VOCs	Submit Site-Specific Emission Factors
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.3	HAP Destruction Efficiency PM / PM ₁₀ / PM _{2.5} (filterable) Condensable PM	Submit Performance Testing Protocol
	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11) and 2.6.B.(6).	5.C.4	CO NO _x VOCs Target HAPs	Submit Performance Test Results to MDEQ
	40 CFR 63.42(c)(2); Subpart B	5.C.5	HAP Destruction Efficiency	Submit Performance Test Results to EPA
AA-204a AA-303a AA-307a AA-308a	40 CFR 64.9(a); CAM	5.C.6	CAM Reporting	Submit Semi-Annual Monitoring Reports
	40 CFR 64.7(e); CAM	5.C.7	CAM Modification	Promptly Notify the MDEQ of Failure to Achieve Limit / Standard (Though No Excursion or Exceedance was Indicated by Approved Monitoring)

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant / Parameter Monitored	Reporting Requirement
AA-301	11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).	5.C.8	Structural Integrity Catalytic Activity	Submit Testing Results Indicating Effective Life of Catalytic Media

5.C.1 For Emission Point AA-000 (Facility-Wide), the permittee shall submit a semi-annual monitoring report (SMR) in accordance with Condition 5.A.4 that includes the following information:

- (a) A summary of any revision(s) made to the “Dust Management Plan” required by Condition 5.B.1 and/or the “Start-Up, Shutdown, and Malfunction Plan” required by Condition 5.B.2 during the reporting period as well as the updated plan(s);
- (b) *For Emission Points AA-200 (Wood Drying Operations), AA-300 (Wood Pellet Operations), AA-400 (Finished Pellet Operations), and AA-500 (Emergency Engines)* – the total emission of PM (filterable), PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), NO_x, CO, and VOCs in tons based on both a monthly and rolling 12-month total basis;
- (c) *For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System)* – the permittee shall include within each SMR the following information for the RTO and/or RCO (as applicable):
 - (1) A description of any maintenance performed while the RTO or RCO was off-line;
 - (2) The date and time when the RTO or RCO was shut down and restarted;
 - (3) If there were no deviations from any operating limit established in accordance with Condition 5.B.6(e), a statement that there were no deviations during the reporting period;
 - (4) For each deviation from an operating limit established in accordance with Condition 5.B.6(e) (including during periods of start-up, shutdown, and malfunction), the permittee shall include the following information in the SMR:
 - (i) The date and time that each malfunction started and stopped;
 - (ii) The date and time that each continuous temperature monitoring system (CTMS) was inoperative, except for zero (low-level) and high-level checks;
 - (iii) The date, time, and duration that each CTMS was out-of-control, including the information specified in 40 CFR 63.8(c)(8), Subpart A.

- (iv) The date and time that each deviation started and stopped as well as whether each deviation occurred during a period of start-up, shutdown, malfunction, or another unspecified period;
 - (v) A summary on the total duration of the deviations during the reporting period and the total duration as a percent of the total operating time of the RTO or RCO during that reporting period;
 - (vi) A breakdown on the total duration of the deviations during the reporting period into those that are due to start-up, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes; and
 - (vii) The date of the latest CTMS certification or audit.
- (d) For Emission Points AA-201 (WESP – RTO Control System), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems) – the permittee shall include the following information on the WESP and each baghouse filter (as applicable):
- (1) *Operation Outside Established Operating Limit* – the specific control device, the date, the beginning and ending times, the cause(s) for each deviation; and any corrective action taken as a result of the deviation.
- (e) For Emission Points AA-203d (Furnace Bypass Stack) and/or AA-204b (Rotary Dryer Bypass Stack) – the permittee shall include in the report the following information:
- (1) The total duration of all combined start-up and shutdown periods in which emissions from the Wood-Fire Furnace are diverted to either the furnace bypass stack or dryer bypass stack in hours on both a monthly and rolling 12-month total basis; and
 - (2) The total duration of all idle mode periods for the Wood-Fired Furnace in hours on both a monthly and rolling 12-month total basis.
- (f) For Emission Point AA-204a (Wood Chip Rotary Dryer) – The total throughput of wood chips dried in oven-dried tons (ODT) on both a monthly and rolling 12-month total basis;
- (g) For Emission Point AA-300 (Wood Pellet Operations) – The total throughput of wood pellets produced in oven-dried tons (ODT) on both a monthly and a rolling 12-month total basis;
- (h) For Emission Point AA-500 (Emergency Engines) – The hours of operation for each emergency engine (including a summary on how many hours are spent for emergency operation, what classified the operation as an emergency situation, how many hours are spent for non-emergency operation, and the circumstance(s) for

non-emergency operation).

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A.(3)(c)(1).)

- 5.C.2 For Emission Points AA-201 (WESP – RTO) and AA-301 (RCO Control System), the permittee shall submit any site-specific emission factors required by Condition 5.B.7 for review by the MDEQ no later than ninety (90) days after completing the corresponding performance testing.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

- 5.C.3 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit a written performance test protocol for testing required by Condition 5.B.6 that details the procedures and test methods to be implemented during the actual testing event no later than thirty (30) days prior to the intended testing date.

Additionally, the permittee may notify the MDEQ in writing at least ten (10) days prior to the intended testing date so that a representative from the MDEQ may be afforded the opportunity to observe the stack testing.

If deemed necessary by the MDEQ, a conference may be required prior to the intended testing date to discuss the proposed test methods and procedures outlined in the performance testing protocol.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

- 5.C.4 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit the results of a performance test required by Condition 5.B.6 to the MDEQ no later than sixty (60) days after completing the actual testing event.

Additionally, the permittee shall include with submission of the results the information specified by Condition 1.25 and the following data (as applicable):

- (a) The applicable parametric monitoring data collected during each test run (i.e., firebox temperature; total power based on secondary current and secondary voltage) and supporting documentation;
- (b) The hourly throughput data for the applicable process units (i.e., wood chips dried; wood pellets produced);
- (c) The feedstock ratio of softwood and hardwood used during the performance test (as applicable);
- (d) The moisture content of the wood pellets produced during the performance test;

- (e) Oxygen (O₂) concentration data; and
- (f) A table summarizing the current and previous performance test results for each pollutant tested [noting the average pollutant emission rate and the average applicable throughput].

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11) and R. 2.6.B.(6).)

5.C.5 For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), the permittee shall submit the results of a performance test required to demonstrate compliance with the total HAP destruction efficiency limits specified in Conditions 3.9 and 3.15 to the EPA no later than sixty (60) days after completion of the performance test in accordance with the following requirements:

- (a) Submit the results of a performance test via the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through the EPA’s CDX (<https://cdx.epa.gov/>). The data must be submitted in a file format generated using the EPA’s Electronic Reporting Tool (ERT) as listed on the following website: (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>).

Alternatively, the permittee may submit an electronic file consistent with the extensible markup language (XML) schema listed on the EPA’s ERT website. When submitting to CEDRI, choose the “*State or Other Regulation – State or Other Regulation*” subpart report named “Performance Test Report (Submittal via CEDRI optional for Federal reporting)”.

- (b) If the permittee claims some of the information submitted to EPA under paragraph (a) is “Confidential Business Information” (CBI), the permittee must submit a complete file (including information claimed to be CBI) to the EPA in accordance with 40 CFR 63.9(k), Subpart A.

Clearly mark the part or all of the information that you claim to be CBI. Information not marked as CBI may be authorized for public release without prior notice. Information marked as CBI will not be disclosed except in accordance with procedures set forth in 40 CFR Part 2 (Public Information). The permittee must submit the same file submitted to the CBI office with the CBI omitted to the EPA via the EPA’s CDX as described in 40 CFR 63.9(k), Subpart A.

(Ref.: 40 CFR 63.42(c)(2); Subpart B)

5.C.6 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), the permittee shall submit a semi-annual monitoring report in accordance with Condition 5.A.4 with the following information (as applicable):

- (a) Summarized information on the number, duration, and cause [including an

unknown cause, if applicable)] of excursions or exceedances (as applicable) and the corrective actions taken;

- (b) Summarized information on the number, duration, and cause [including unknown cause (if applicable)] for monitor downtime incidents [other than downtime associated with zero and span or other daily calibration checks (if applicable)];
- (c) A description of the actions taken to implement a QIP during the reporting period as specified in Condition 5.B.16. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances.

(Ref.: 40 CFR 64.9(a); CAM)

- 5.C.7 For Emission Points AA-204a (Wood Chip Rotary Dryer), AA-303a (Primary Dry Hammermill Systems), AA-307a (Secondary Dry Hammermill Systems), and AA-308a (Pellet Mill / Cooler Systems), if the permittee identifies a failure to achieve compliance with the emission limitation or standard for which the approved CAM monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes.

Such a modification may include (but is not limited to) reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or monitoring additional parameters.

(Ref.: 40 CFR 64.7(e); CAM)

- 5.C.8 For Emission Points AA-301 (RCO Control System), the permittee shall submit the results of each test evaluating the effective life of catalytic media (as required by Condition 5.B.22) no later than sixty (60) days after completing the actual testing event.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B.(11).)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances containing class I, class II or non-exempt substitute refrigerants;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as

well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
gr./dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lb./hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTU/H	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 61; or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63
NM VOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR Part 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
PM _{2.5}	Particulate Matter less than 2.5 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOHAP	Volatile Organic Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

Compliance Assurance Monitoring (CAM) Plans

COMPLIANCE ASSURANCE MONITORING (CAM) PLANS
Amite BioEnergy, LLC
Gloster, Mississippi

Regenerative Thermal Oxidizer (RTO) – Volatile Organic Compounds (VOC)	
Parameter	Description
Indicator	Combustion Chamber Outlet Temperature
Monitoring Approach	Hourly recording of combustion chamber outlet temperature using a thermocouple. Temperature data will be recorded continuously.
Indicator Range	Minimum: Target range: 1500°F, but will be determined during compliance testing, and with an approved emissions testing protocol. The temperature will be optimized to minimize natural gas usage in the RTO while maintaining the desired destruction efficiency.
Response to Indicators Action Level Range	A combustion chamber outlet that is below the applicable minimum threshold temperature during normal operating conditions value will trigger an audible and/or visible alarm in the control room. Amite BioEnergy will take the following immediate corrective actions: * If the temperature cannot be raised to satisfy the applicable minimum threshold within 60 minutes from the start of the excursion, the furnace/dryer will be shutdown. The cause of the excursion must be corrected and documented prior to re-starting the furnace/dryer. The Rotary Dryer is equipped with a bypass stack for WESP and RTO malfunctions.
Quality Improvement Plan Threshold	Six excursions in a six-month reporting period.
Performance Criteria Data Representativeness	Maintenance of adequate combustion chamber temperature assures proper destruction of both CO and VOCs; control efficiency is a function of temperature.
Averaging Period	Three-hour average.
Recordkeeping	Combustion chamber temperature is monitoring continuously. The temperature data will be stored in a data acquisition system.
QA/QC Practices and Criteria	Annual calibration or replacement per manufacturer's specifications.

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RTO – VOC and Carbon Dioxide (CO)	
Indicator	Annual inspections of burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.
Monitoring Approach	Inspections of burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork will be conducted annually.
Indicator Range	N/A
Response to Indicators Action Level Range	N/A
Quality Improvement Plan Threshold	N/A
Performance Criteria Data Representativeness	Inspections will ensure proper operation of the burner and RTO.
Averaging Period	Annually.
Recordkeeping	Manual logs of inspections.
QA/QC Practices and Criteria	Logs for these inspections will be reviewed promptly after the annual inspection is performed to ensure that repairs are made or replacement parts are installed in a timely manner.
Wet Electrostatic Precipitator (WESP) – Particulate Matter (PM₁₀ and PM_{2.5})	
Indicator	Continuous monitoring of Power (each field) in kW.
Monitoring Approach	Continuously monitor power after each of the three transformer/rectifier sets.
Indicator Range	Change in power (initial proposed ranges for each 3 fields of 20.38 kW); range will be determined during verification of operational status. Power will be optimized during facility compliance testing. A power that is below the applicable minimum threshold value during normal operating conditions will trigger an audible and/or visible alarm in the control room.
Response to Indicators Action Level Range	If the ammeter indicates a change in power, Amite BioEnergy will take the following immediate corrective actions: <ul style="list-style-type: none"> • Review power levels for irregularities; • Assess the cause of the change in power; • If the power cannot be raised to satisfy the applicable

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	<p>minimum threshold within 60 minutes from the start of the excursion, the furnace/dryer will be shutdown. The cause of the excursion must be corrected and documented prior to re-starting the furnace/dryer.</p> <ul style="list-style-type: none"> If review of the other parameters indicates a malfunction, furnace/dryer and WESP will be shutdown. <p>The furnace is equipped with a bypass stack for rotary dryer, WESP, and RTO malfunctions.</p>
Quality Improvement Plan Threshold	Six excursions in a six-month reporting period.
Performance Criteria Data Representativeness	Power affects the collection efficiency and is typically low and constant. An increase or drop in power indicates a malfunction.
Averaging Period	The power will be averaged over a 3-hour period.
Recordkeeping	Power is recorded continuously in a data acquisition system.
QA/QC Practices and Criteria	Annual calibration or replacement per manufacturer's recommendations.
Regenerative Catalytic Oxidizer (RCO) – VOCs	
Indicator	Combustion Chamber Outlet Temperature
Monitoring Approach	Hourly recording of combustion chamber outlet temperature using a thermocouple. Temperature data will be recorded continuously.
Indicator Range	<p>Minimum: Target range: 650°F (requested range from manufacturer), but will be determined during compliance testing and with an approved emission testing protocol.</p> <p>The temperature will be optimized to minimize natural gas usage in the RCO while maintaining the desired destruction efficiency.</p>
Response to Indicators Action Level Range	<p>A combustion chamber outlet that is below the applicable minimum threshold temperature during normal operating conditions value will trigger an audible and/or visible alarm in the control room.</p> <p>Amite BioEnergy will take the following immediate corrective actions:</p> <ul style="list-style-type: none"> * If the temperature cannot be raised to satisfy the applicable minimum threshold within 60 minutes from the start of the excursion, half of the hammermills and pellet coolers will be shut down

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	because the RCO has 2 parallel sides. The current design capacity of each chamber is 130,000 SCFM for a total of 260,000 SCFM for two chambers. After the start of the excursion, the blower flow rate shall be reduced to 130,000 SCFM. The cause of the excursion must be corrected and documented prior to re-starting the hammermills and pellet coolers.
Quality Improvement Plan Threshold	Six excursions in a six-month reporting period.
Performance Criteria Data Representativeness	Maintenance of adequate combustion chamber temperature assures proper destruction of VOCs; control efficiency is a function of temperature.
Averaging Period	Three-hour average.
Recordkeeping	Combustion chamber temperature is monitoring continuously. The temperature data will be stored in a data acquisition system.
QA/QC Practices and Criteria	Annual calibration or replacement per manufacturer's specifications.
Hammermill Pneumatic System Filters (Baghouse) – PM₁₀ and PM_{2.5}	
Indicator	Pressure drop across filters
Monitoring Approach	Differential pressure gauge
Indicator Range	Pressure drop range of 0.25" to 8" H ₂ O. The cleaning cycle is on a timer.
Response to Indicators Action Level Range	If a change in pressure drop outside the indicator range is observed, Amite BioEnergy will take the following immediate corrective actions: <ul style="list-style-type: none"> • Conduct visual observation of Hammermill cyclones; • Inspect filters for any tears, leaks or plugging; • Inspect hammermill filters; and • Determine if there is an excursion of visual observations. Differential pressure will be optimized during inspections or maintenance activities.
Quality Improvement Plan Threshold	Six excursions in a six-month reporting period.
Performance Criteria Data Representativeness	Indication of performance degradation by increase or decrease in pressure drop outside the operational ranges.
Averaging Period/Frequency	Once daily reading

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Recordkeeping	All pressure drop measurements will be recorded in an electronic database.
QA/QC Practices and Criteria	Calibration of differential pressure gauge per manufacturer's specifications and annual inspection of hammermill filters.
Pellet Cooler Pneumatic System Filters (Baghouse) – PM₁₀ and PM_{2.5}	
Indicator	Pressure drop across filters
Monitoring Approach	Differential pressure gauge
Indicator Range	Pressure drop range of 0.25" to 8" H ₂ O. The cleaning cycle is on a timer.
Response to Indicators Action Level Range	If a change in pressure drop outside the indicator range is observed, Amite BioEnergy will take the following immediate corrective actions: <ul style="list-style-type: none"> • Conduct visual observation of Hammermill cyclones; • Inspect filters for any tears, leaks or plugging; • Inspect hammermill filters; and • Determine if there is an excursion of visual observations. Differential pressure will be optimized during inspections or maintenance activities.
Quality Improvement Plan Threshold	Six excursions in a six-month reporting period.
Performance Criteria Data Representativeness	Indication of performance degradation by increase or decrease in pressure drop outside the operational ranges.
Averaging Period/Frequency	Once daily reading
Recordkeeping	All pressure drop measurements will be recorded in an electronic database.
QA/QC Practices and Criteria	Calibration of differential pressure gauge per manufacturer's specifications and annual inspection of hammermill filters.
Regenerative Catalytic Oxidizer (RCO) – VOCs	
Indicator	Annual inspections of burner/combustion chamber to ensure that all refractory modules are in good shape and that the ceramic media shows no sign of degradation. Remove the main fan access hatch and examine the wheel for signs of particulate deposition or corrosion. Examine the main fan coupling to ensure proper alignment is being maintained. Examine the combustion burner internals. Verify instrumentation calibration.

COMPLIANCE ASSURANCE MONITORING (CAM) PLANS
Amite BioEnergy, LLC
Gloster, Mississippi

Monitoring Approach	Inspections for burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork will be conducted annually.
Indicator Range	N/A
Response to Indicators Action Level Range	N/A
Quality Improvement Plan Threshold	N/A
Performance Criteria Data Representativeness	Inspections will ensure proper operation of the burners and RCO.
Averaging Period	Annually
Recordkeeping	Manual logs of inspections
QA/QC Practices and Criteria	Logs for these inspections will be reviewed promptly after the annual inspection is performed to ensure that repairs are made or replacement parts are installed in a timely manner.